

Attachment C

Wayne M. Grip, President, Aero-Data Corporation

Education: University of Wisconsin, Madison. BS in Geology (1966)
University of Wisconsin, Madison. Graduate studies in soils and turf-grass agronomy (1970-1971)

Organizations: American Society of Photogrammetry and Remote Sensing
American Congress on Surveying and Mapping

Professional Experience:

11/1/87 to Present Aero-Data Corporation, Baton Rouge, LA,
President and Principal Owner

Co-founder of Aero-Data Corporation in 1983. Aero-Data specializes in aerial photography and mapping, environmental photointerpretation, and accident site investigations. The company has been in operation for over twenty-two years. It has a complete photolaboratory and two airplanes as well as state of the art aerial mapping cameras, GPS surveying and navigation receivers, photogrammetric scanners, digital stereoplotters / photointerpretation work stations and high resolution, large format computer plotters.

Mr. Grip has over twenty-nine years of experience in his field. As a geologist, cartographer, photographer, photointerpreter and pilot, he designs and directs all aspects of projects involving photointerpretation, photogrammetry, and photography acquisition (includes overflights with Aero-Data aircraft). These projects have amounted to over 1000 sites in 36 different states to date and include historical aerial photography based hazardous waste site investigations, surface mine inspections and permitting, environmental audits, accident site investigations, annual site documentation using aerial photography, video, and thermal imagery, contour mapping of plant sites, stock pile volume determinations, geographic information systems and coastal zone erosion studies. He has provided expert testimony on over twenty-five occasions in federal and state court in the areas of photointerpretation and photogrammetry. His testimony often includes the areas of surface water hydrology and agronomy as it relates to the photointerpretation of surface drainage features and vegetation features.

Under Mr. Grip's direction, the company has developed a client list which includes many of the major corporations and law firms in the United States as well as government agencies such as the U.S. Environmental Protection Agency, U.S. Soil Conservation Service, U.S. Department of Justice, the Louisiana Department of Transportation and Development, the Louisiana Department of Natural Resources, and the Louisiana Department of Environmental Quality.

He has attended numerous seminars on photogrammetry and remote sensing and has given short courses on environmental photointerpretation and mapping for the University of Wisconsin, U.S. Army Corps of Engineers, U.S. Office of Surface Mining, and the Louisiana Department of Environmental Quality.

1/1/83 to 11/1/87 Aero-Data, Inc., Baton Rouge, LA,
Vice-President

Part time employment as one of the principal owners of Aero-Data Corporation while working full time for the Louisiana Department of Natural Resources and later G&E Engineering. The Aero-Data work was conducted on weekends during off duty hours for clients not regulated by the Louisiana Department of Natural Resources. This continued until April 1986 when he began full time employment with Aero-Data as Vice-President in charge of operations. In November of 1987 he became president of Aero-Data and later, the principal owner.

1/1/86 to 4/30/86 G&E Engineering, Inc., Baton Rouge, LA,
Program Manager, Photointerpretation and Hydrology

Responsible for conducting historical aerial photography studies, planning and directing field investigations, conducting field testing programs (pump drawdown tests, geophysical tests, etc.), conducting groundwater contamination assessments (including modeling of groundwater flow and contaminant migration). Mr. Grip left G&E Engineering after a short period of time so as to pursue his interests in historical aerial photography studies on a full time basis.

1980 to 12/31/85 Louisiana Office of Conservation, Surface Mining Division, Baton Rouge, LA,
Staff Geologist

Responsible for environmental regulation of surface mining in the State of Louisiana. Conducted reviews of highly complex surface mine permit applications and environmental impact statements. Conducted historical aerial photography studies to determine the previous land use of properties scheduled for mining. Developed and implemented a remote sensing monitoring program using a small airplane system to photograph and video tape surface mining operations. Conducted field inspections of exploration drilling and mining operations, oil and gas production sites and oil field waste sites. Participated in reclamation research activities in conjunction with the Soil Conservation Service, Louisiana State University and the potential mining companies. These research activities involved the evaluation of the capability of overburden soil substitutes to support vegetation growth, their susceptibility to water and wind caused erosion and the resultant potential risk for surface water and ground water contamination. Attended numerous seminars on mining and reclamation procedures and consulted with other state and federal regulatory agencies and the industries they regulate.

1974 to 1980 Louisiana Office of Human Development, Baton Rouge, LA,
Management Analyst II

Managed two large state wide computer systems used to track services provided to clients and pay vendors for the services delivered. Designed and tested software changes and trained social workers in the use of the systems.

1973 to 1974 Consultant with the North Wood Country Club, Dallas, TX
Delhi Golf Club, Delhi, LA,
Turf Grass Agronomist

Duties for this and the below superintendent position included: environmental permitting operations, budget preparation, design of maintenance programs, equipment purchases and maintenance, surveying, soil sampling, specifying soil mixes, design of drainage systems, design of underground automatic irrigation systems and surface impoundments, siting of deep irrigation wells, conducting turf grass research, staff supervision, and serving on the board of the Wisconsin Golf Course Superintendents Association.

1972 to 1973 Westmoor Country Club, Milwaukee, WI, Golf Course
Superintendent

1966 to 1970 Officer, U.S. Air Force, Strategic Air Command
Photointerpreter and Cartographer

Upon graduation from college entered Officer Training School and was commissioned a 2nd Lt in the USAF. Promoted to 1st Lt and then Captain within three years. Captain Grip's primary assignment was to a Reconnaissance Technical Squadron whose mission was to produce air target charts. These charts were used by B52 and FB111 bombers to navigate within specified potential training and target areas. He was placed in charge of a map production unit, which utilized photointerpretation and photogrammetry procedures as the primary source of information. Later he became the officer in charge of a target intelligence center, which researched and distributed maps and photographs to tactical Air Force units worldwide. While in this assignment he designed and implemented a geographic information system (GIS) for the center. This was one of the first GIS's to be implemented in the United States. Received the Air Force Commendation Medal upon release from active duty in recognition of this achievement.

Attachment D

Expert Testimony of Wayne Grip in the Past Five Years

Trial testimony is listed first followed by deposition testimony

Trial Testimony

TYPE OF WORK

November 10, 2003

Superior Court Hillsborough County, New Hampshire (Northern District)

Shelia Longden v. Philip Morris USA

Docket No: 00-C-0462

Photointerpretation & Photogrammetry

Study of Herbicide Spray missions in Vietnam in comparison with Mr. Longden's unit location and service times.

Philip Morris USA was the client.

March 21/22, 2005

U.S.D.C. (Southern District of New York)

Olin Corporation v. Insurance Company of North America, et al.

Civil Action No. 84 Civ. 1968 (TPG)

Photointerpretation & Photogrammetry

Historical photography study of multiple sites in Niagara Falls, New York.

Olin was the client.

April 7/8, 2005

U.S.D.C. (Eastern District of Texas)

Lyondell Chemical Company, et al. v. Albemarle Corporation, et al.

Civil Action No. 01:01-CV-890

Photointerpretation & Photogrammetry

Historical photography study Turtle Bayou Site.

PPG (Joint Defense Group) was the client.

April 12, 2005

Louisiana 19th Judicial District Court Division H

Johnson v City of Baton Rouge et al.

Civil action No.

Photogrammetry of an accident scene

The plaintiff was represented by Danny Vidrine

November 3, 2005

U.S.D.C. (Southern District of New York)

Olin Corporation v. Insurance Company of North America, et al.

Civil Action No. 84 Civ. 1968 (TPG)

Photointerpretation & Photogrammetry

Historical photography study of two sites in Aberdeen, North Carolina.

Olin was the client.

February 16, 2006

U.S.D.C. (Eastern District of Texas)

Lyondell Chemical Company, et al. v. Albemarle Corporation, et al.

Civil Action No. 01:01-CV-890

Photointerpretation & Photogrammetry

Historical photography study Turtle Bayou Site. (Retrial)

PPG (Joint Defense Group) was the client.

February 24, 2006

U.S.D.C. (Southern District of New York)

Olin Corporation v. Insurance Company of North America, et al.

Civil Action No. 84 Civ. 1968 (TPG)

Photointerpretation & Photogrammetry

Historical photography study of a site in McIntosh, Alabama.

Olin was the client.

April 26, 2006 (Class Hearing)Jesse Fisher, et al. v. Ciba Specialty Chemicals, et al.

U.S.D.C. (Southern District of Alabama)

Civil No. 03-566 (Division WS-B)

Historical study of a site in McIntosh, Alabama

Ciba was the client.

Photointerpretation & Photogrammetry

April 6 and 9, 2007 (Retrial)

U.S.D.C. (Southern District of New York)

Olin Corporation v. Insurance Company of North America, et al.

Civil Action No. 84 Civ. 1968 (TPG)

Historical photography study of multiple sites in Niagara Falls, New York.

Olin was the client.

Photointerpretation & Photogrammetry

April 30, 2007 (Arbitration)In Re Arbitration Between: XIK Corp., Domtar Inc., and Honeywell International, Inc

Reference Number 1220035101

Photointerpretation & Photogrammetry

Deposition Testimony**TYPE OF WORK**

10/3/2003

Shelia Longden v. Phillip Morris USA

Superior Court

Hillsborough County, New Hampshire (Northern District)

Docket No: 00-C-0462

Tracking a Vietnam vet and spray missions in Vietnam

Photointerpretation & Photogrammetry

10/31/2003

Cutbank, L.L.C. v. City of Bossier City, Louisianaand H&H Contracting Company, Inc

First Judicial District Court

Caddo Parish, Louisiana

Number: 451,463 Section A

Historical study of the movement of a river and land use over time

Photointerpretation & Photogrammetry

5/18/2004

Lyondell Chemical Company, et al. v. Albemarle Corporation, et al.

U.S.D.C. (Eastern District of Texas) Beaumont Division

C.A. No. 1:01-CV-890

Historical photography study of the Turtle Bayou Site.

Photointerpretation & Photogrammetry

1/4/2005

Carrie Jean LaBauve et al. v. Olin Corporation

U.S.D.C. (Southern District of Alabama)

C.A. No. 03-567 Division WS-B

Historical study of a chemical plant

Photointerpretation & Photogrammetry

1/20/2005

Carney Products v. B.J. Carney, et al.*Historical study of a site in Ste. Maries, Idaho*

Photointerpretation & Photogrammetry

3/8/2005

Olin Corporation v. Insurance Company of North America, et al.

U.S.D.C. (Southern District of New York)

Civil Action No. 84 Civ. 1968 (TPG)

Historical of a chemical plant and other sites in Niagara New York

Photointerpretation & Photogrammetry

4/26/2005

Massachusetts Electric Co., et al. v. Travelers Casualty & Surety Co., et al

Worcester Superior Court

Civil Action No. 99-00467B

Historical study of Boston manufactured gas plants

Photointerpretation & Photogrammetry

5/3&4/2005	<u>Consolidated Edison Company of New York, Inc. v. American Home Insurance Company, et al</u> Supreme Court of the State of New York Index No. 600527/01 <i>Historical study of New York manufactured gas plants</i>	Photointerpretation & Photogrammetry
5/12/2005	<u>ANODYNE v</u> U.S.D.C. Miami, Florida Civil Action No. <i>Historical study of an anodizing plant in Miami Florida</i>	Photointerpretation & Photogrammetry
10/14/2005	<u>Home Insurance Company v. Cornell-Dubilier Electronics, Inc. et al.</u> <u>Cornell-Dubilier Electronics, Inc. et al. v. United Insurance Company</u> <i>Historical study of a site in Edgefield, South Carolina</i>	Photointerpretation & Photogrammetry
10/26/2005	<u>Olin Corporation v. Insurance Company of North America, et al.</u> U.S.D.C. (Southern District of New York) Civil Action No. 84 Civ. 1968 (TPG) <i>Historical study of two sites in Aberdeen, North Carolina</i>	Photointerpretation & Photogrammetry
1/10/2006	<u>Plantation Pipeline Co. v. Continental Casualty</u> U.S.D.C. (Northern District of Georgia, Atlanta) Civil Action No. 1-03-CV-2811 <i>Historical study of a pipeline site near Darbun, Mississippi</i>	Photointerpretation & Photogrammetry
1/30&31/2006	<u>Otay Land Company, et al. v. U.E. Limited, L.P., et al.</u> U.S.D.C. (Southern District of California) Civil Action No. 03CV2488BEN(POR) <i>Historical study of a shooting range in Chula Vista, California</i>	Photointerpretation & Photogrammetry
2/9/2006	<u>Olin Corporation v. Insurance Company of North America, et al.</u> U.S.D.C. (Southern District of New York) Civil Action No. 84 Civ. 1968 (TPG) <i>Historical study of a site in McIntosh, Alabama</i>	Photointerpretation & Photogrammetry
3/3/2006	<u>Jesse Fisher, et al. v. Ciba Specialty Chemicals, et al.</u> U.S.D.C. (Southern District of Alabama) Civil No. 03-566 (Division WS-B) <i>Historical study of a site in McIntosh, Alabama</i>	Photointerpretation & Photogrammetry
4/12/2006	<u>June Pryor Avance, et al. v. Kerr-McGee Chemical, LLC</u> U.S.D.C. (Eastern District of Texas) Civil No. 5:04-CV-209-DF-CMC <i>Historical study of a site in Texarkana, Texas</i>	Photointerpretation & Photogrammetry
2/23/2006	<u>Sarah Clopton, et al. v. Pharmacia Corp. and Pfizer, Inc.</u> U.S.D.C. (Northern District of Alabama-Southern Division) Case No.: CV-03-C-3369-S, CV-03-C-3374-S, CV-03-C-3371-S <i>Historical Study of a site in Anniston, Alabama</i>	Photointerpretation & Photogrammetry
2/27/2006	<u>Arbitration between XIK Corp., Domtar Inc. and Honeywell International</u> Reference No. 1220035101	Photointerpretation & Photogrammetry
2/28/2007	<u>Olin Corporation v. Insurance Company of North America, et al.</u> U.S.D.C. (Southern District of New York) Civil Action No. 84 Civ. 1968 (TPG) <i>Historical study of two sites in Niagara Falls, NY</i>	Photointerpretation & Photogrammetry

4/25/2007	<u>The Travelers Indemnity Co. v. Orange and Rockland Utilities, Inc.</u> Index No. 603601/02 (N.Y. Sup.) <i>Historical study of 6 sites in New York</i>	Photointerpretation & Photogrammetry
5/23/2007	<u>Gary Roth v. Amica Mutual</u> Civil District Court Civil Action No. 05-13528 <i>Historical study involving house damage in New Orleans, LA</i>	Photointerpretation & Photogrammetry
11/20/2007	<u>Louisiana Department of Transportation and Development v. Kansas City Southern Railway Company, et al.</u> First Judicial District Court, Parish of Caddo Suit No: 417,190-B <i>Historical study of a Train Derailment in Shreveport, LA</i>	Photointerpretation & Photogrammetry
12/17/2007	<u>Celanese Corporation v. Coastal Water Authority, et al.</u> U.S.D.C. (Southern District of Texas-Houston Division) Case No. 4:06-CV-02265 <i>Historical study of a pipeline rupture in Shoreacres, TX</i>	Photointerpretation & Photogrammetry
5/12/2008	<u>Ponca Tribe of Indians of Oklahoma, et al. v. Continental Carbon Company et al.</u> U.S.D.C. (Western District of Oklahoma) Case No. CIV-05-445-C <i>Historical study of a Carbon Plant and Surrounding Areas, OK</i>	Photointerpretation & Photogrammetry
5/12/2008	<u>Alvarez, et al. v. Continental Carbon Company et al.</u> District Court of Kay County, Oklahoma Case No. CJ-2007-104PC <i>Historical study of a Carbon Plant and Surrounding Areas, OK</i>	Photointerpretation & Photogrammetry
8/12/2008	<u>Celanese Corporation v. Coastal Water Authority, et al.</u> U.S.D.C. (Southern District of Texas-Houston Division) Case No. 4:06-CV-02265 <i>Historical study of a pipeline rupture in Shoreacres, TX (Supplemental Report)</i>	Photointerpretation & Photogrammetry
9/17/2008	<u>Catena v. Andersen, et al.</u> Superior Court of New Jersey, Bergen County Docket No. BER-L-5914-05 <i>Historical Study of the area surrounding the Catena Site in Teterboro, New Jersey</i>	Photointerpretation & Photogrammetry

Publications By Wayne Grip

April 2001

Combining Aerial Photography Aerial and Geographic Information Systems in Environmental Forensic Investigations.

In: *Proceedings: Environmental Litigation: Advanced Forensic and Legal Strategies*.

University of Wisconsin. College of Engineering and Professional Development

San Francisco, CA. April 4-5, 2001.

November 2000

Application of Aerial Photography and Photogrammetry in Environmental Forensic Investigations

Wayne M Grip, Randall W. Grip and Robert D. Morrison

Journal of Environmental Forensics (2000) 1, 121-129

April 2000

Advances in Aerial Photography and Photogrammetry for Forensic Investigations and Trial Exhibits.

In: *Proceedings: Environmental Litigation: Advanced Forensic and Legal Strategies*.

University of Wisconsin. College of Engineering and Professional Development

San Francisco, CA. April 13-14, 2000.

November 99

Use of Geographic Information Systems for Effective Courtroom Presentations.

In-House Environmental Protection Agency Training.

In: *Forensics in Environmental Science and Technical Applications*. Chicago, Illinois. November 8-10, 1999.

September 98

Using Historical Aerial Photography to Identify Probable Contaminant Sources.

In: *Proceedings: Environmental Forensics: Determining Liability through Applied Science*. International Business

Communications. Houston, Texas. September 24-25, 1998

December 95

Use and Presentation of Aerial Photographs as Evidence.

In: *Proceedings: Environmental Litigation: Hydrocarbons, Chlorinated Solvents and Visual Display of Evidence*. University of

Wisconsin, College of Engineering and Professional Development. Kahuku, Oahu, Hawaii. December 1-2, 1995